EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

KEITH FISCHER, MICHAEL O'SULLIVAN, JOHN MOESER, LOUIS PIA, THOMAS BARDEN, CONSTANCE MANGAN, and CHARISE JONES, individually and on behalf of all others similarly situated,
 	
    Plaintiffs,
  v.
 	
GOVERNMENT EMPLOYEES INSURANCE COMPANY,
 	
    Defendant.
	Case No. 2:23-CV-02848 (SJB)
	
	[PROPOSED] BRIEFING SCHEDULE FOR DEFENDANT'S *DAUBERT* MOTION AND SUMMARY JUDGMENT MOTION

Defendant Government Employees Insurance Company ("Defendant"), by and through their attorneys of record, hereby proposes the following briefing schedule for applicable to: (i) Defendant's motion for summary judgment as to the Named Plaintiffs' claims; and (ii) Defendant's motion to exclude the declaration and testimony of Plaintiffs' identified expert, Catherine O'Neil, pursuant to Rule 702 of the Federal Rules of Evidence and the principles set forth *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579, 597 (1993):

- Defendant's *Daubert* Motion to Exclude the Testimony of Catherine O'Neil and Motion for Summary Judgment due by June 30, 2025;

- Plaintiffs' Response in Opposition to Defendant's *Daubert* Motion to Exclude the Testimony of Catherine O'Neil and Response in Opposition to Defendant's Motion for Summary Judgment due: July 28, 2025; and

- Defendant's Reply in Support of its *Daubert* Motion to Exclude the Testimony of Catherine O'Neil and Reply in Support of its Motion for Summary Judgment due: August 25, 2025.

Dated: June 16, 2025

GOVERNMENT EMPLOYEES
INSURANCE COMPANY

/s/ Gerald L. Maatman, Jr.
Gerald L. Maatman, Jr.
Jennifer A. Riley
Gregory Tsonis
Gregory S. Slotnick
DUANE MORRIS LLP
335 Madison Avenue, 23rd Floor
New York, NY 10017-4669
Telephone: +1 312 499 6700
Fax: +1 312 499 6701
E-mail: gmaatman@duanemorris.com
E-mail: jariley@duanemorris.com
E-mail: gtsonis@duanemorris.com
E-mail: gsslotnick@duanemorris.com

*Attorneys for Defendant Government
Employees Insurance Company*

SO ORDERED:

_____
Hon. Sanket J. Bulsara
United States District Court Judge